

Memorandum

To: Pam Scully, EPA Region 4 RPM
From: Richard Henry, Environmental Response Team
Date: Nov 3, 2021
Re: Comments on the Pre-Final 95% Remedial Design Basis of Design Report for the LCP Chemicals Superfund Site Operable Unit 1 and Appendix I, Long-Term Monitoring Plan

The Pre-Final 95% Remedial Design Basis of Design Report for the LCP Chemicals Superfund Site Operable Unit 1 and Appendix I, Long-Term Monitoring Plan (LTMP) were reviewed. The objective of the review was to evaluate whether the planned remedy is ecologically protective while minimizing long-term ecological impacts of remedial actions.

Significant issues identified in the review include:

- The Record of Decision (ROD; EPA Region 4, 2015) states, “Sufficient sampling in Domains 1, 2 and 3 will be undertaken during the Remedial Design phase to confirm that the polychlorinated dibenzodioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) are co-located with the Aroclor 1268.” The 95% Remedial Design Plan does not indicate whether the dioxin/furan and Aroclor 1268 sampling was conducted. If this analysis was included in the Preliminary Design Investigation (PDI), this information should be presented in this document.
- It is unclear whether any chemistry samples will be collected following remedial activities to confirm whether predicted surface-weighted average concentrations (SWACs) or clean-up levels (CULs) were achieved. Confirmation samples should be collected.
- More detail on the proposed monitoring studies is needed. Methods (particularly for the benthos evaluation) and performance standards (particularly for benthos and ecological tissue sampling) need to be clearly described in Appendix I.

Detailed comments on the 95% Remedial Design Basis of Design Report are presented in Table 1. Detailed comments on Appendix I, the Long-Term Monitoring Plan, are presented in Table 2.

Table 1. ERT comments on the Pre-Final 95% Remedial Design Basis of Design Report for the LCP Chemicals Superfund Site Operable Unit 1

#	Section, page number, text	ERT Comment
1	Section 1.1.2, page 3: “Preliminary Remediation Goals (PRGs) and the refined Cleanup Levels (CULs) [for sediment] were split into two categories to consider the range of receptors; surface-weighted average concentrations (“SWACs”) for Aroclor 1268 and mercury for each site domain and major creek, as well as benthic community CULs for mercury, Aroclor 1268, lead, and polycyclic aromatic hydrocarbons (PAHs).”	<p>This section should provide information on how the SWACs were calculated. Providing an example of a SWAC calculation would help clarify the process.</p> <p>This document should also include a discussion of how attainment of the CULs will be documented. Currently, it seems like the evaluation of whether dredging is complete relies on verifying whether target dredge cuts were achieved rather than chemistry (Appendix G, Figure G-2).</p>
2	<p>Section 1.1.2, page 3: “Further details of CULs and calculations of SWACs are provided in later sections of this 95 Percent (%) Remedial Design Basis of Design Report (BODR) and associated appendices.”</p> <p>Section 6, page 42: “Further details of SWAC evaluations and sediment monitoring are included in Appendix C and Appendix I.”</p>	<p>Please specify where the details for how SWACs were calculated are presented. It is not apparent where in this document these calculation methods are discussed further or what Appendix this discussion is in.</p> <p>Appendix C presents revised SWACs based on updated boundary areas, but no information on how the SWACs were calculated. No information on how SWACs were calculated is presented in Appendix I.</p>
3	<p>Section 1.1.3, page 5: The major components of the Record of Decision (ROD) remedy after refinements based on Pre-Design Investigation (PDI) include the following:</p> <ul style="list-style-type: none"> • Dredging approximately 8 acres (~32,000 cubic yards [CY] in Purvis Creek, LCP Ditch, Eastern Creek, and Domain 3 Creek) to a target depth of 18 inches; • Backfilling the dredged areas with ~20,000 CY of clean material; • Replanting the disturbed vegetated marsh areas with native plants; • Thin-layer cover placement on approximately 12 acres of marsh; • Confirmation of co-location of dioxins/furans with Aroclor 1268; 	<p>Based on comparison of the list from the ROD on Page 3 with the refined list on Page 5:</p> <p>1) Bullet 2: State target depth for backfill</p> <p>2) Bullet 5: Sampling to confirm co-location of dioxins/furans with Aroclor 1268 is not discussed anywhere in this document or appendices. Discussion of sampling results to confirm that dioxins/furans and Aroclor 1268 are co-located should be added to this report.</p>

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	<ul style="list-style-type: none"> • Dewatering dredged sediments on site and disposing of them at licensed off-site facilities; • Constructing staging and laydown areas and temporary access roads; • Restoring of disturbed areas; • Monitoring in the short term during the construction phase, including soundings and surveys to verify removal depths, depth verification measurements to document material placed, and/or material coverage assessments; • Monitoring in the long term the remedy's long-term effectiveness in enhancing ecosystem recovery and reducing risks to human health and the environment; and • Institutional controls. 	
4	<p>Section 13.2.2 of the 2015 ROD (USEPA Region 4, 2015) states, "Sufficient sampling in Domains 1, 2 and 3 will be undertaken during the Remedial Design phase to confirm that the polychlorinated dibenzodioxins (PCDDs) and polychlorinated dibenzofurans (PCDFs) are co-located with the Aroclor 1268. In the event that they are not co-located, a ROD Amendment may be required."</p>	<p>The 95% Remedial Design Plan does not indicate whether the dioxin/furan and Aroclor 1268 sampling was conducted. If this analysis was part of the PDI, this information should be presented in this document.</p>
5	<p>Section 2.1.3, page 10: "Chemicals in sediment were delineated by previous comprehensive investigations during the RI and FS and supplemented with limited additional sampling to support preliminary capping evaluations outlined in the <i>Pre-Design Investigation Evaluation Report</i> (Anchor QEA 2019). Results from these investigations were used to delineate sediment concentrations of the four COCs: mercury, Aroclor 1268, lead, and total PAHs."</p>	<p>As noted in Comments #3 and #4, it does not sound like dioxin/furan analysis was conducted to confirm co-location of Aroclor 1268 and dioxins/furans. Discussion of sampling results to confirm that dioxins/furans and Aroclor 1268 are co-located should be added to this report.</p>
6	<p>Figures 2-1 through 2-4</p>	<p>Shading on recent samples should be consistent. For example, on Figure 2-4d surface sample BRD-CO46 is shaded orange (exceeded PAH CUL of 4 parts per million [ppm]) while surface samples BRD-CO27, -CO33 and CO-39 exceed the PAH CUL and are not shaded.</p>

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7	Page 14: “To test water generated from mechanical removal ... The elutriate water was collected from this layer of clear water, filtered with a 0.45-micron filter and submitted for laboratory analysis of mercury, lead, polychlorinated biphenyls (PCBs) Aroclor 1268, and PAHs, as well as total suspended solids, biochemical oxygen demand, cyanide, phenolics, and oil/grease.”	Total and filtered samples should have been sent for analysis. Water quality criteria for PCBs are based on unfiltered (total) samples. Please clarify that total PCBs, not just Aroclor 1268, will be analyzed.
8	Table 2.1	<p>Most of the elutriate water samples exceeded the saltwater chronic ambient water quality criterion (AWQC) for PCBs (0.03 micrograms per liter [$\mu\text{g/L}$]), even though filtered samples were collected. Total and filtered samples should be collected and sent for analysis.</p> <p>The detection limit (DL) for lead (10 $\mu\text{g/L}$) was not sufficient to determine if elutriate water exceeded the chronic AWQC of 8.1 $\mu\text{g/L}$—one J-qualified result exceeded this. Analytical methods with lower detection limits should be explored for use in long-term monitoring.</p>
9	Section 2.4.1, page 19: “At this time, no formal biological work windows have been identified in state and federal regulations that impact the work within Operable Unit 1 (OU1). However, because of the possible presence of multiple threatened or endangered (T&E) species (species), including wood storks and manatees, and possibly sea turtles and bottlenose dolphins, in the Site’s vicinity, biological protections will be utilized during the work.”	This section has been expanded since the 50% draft and includes actions that will be taken to minimize potential interactions with/effects on T&E species if they are present in the work area. The proposed actions are adequate.
10	Section 2.4.1, page 20: “If species are observed by any on-site personnel within or adjacent to an active work area, work will be stopped and will shift to another area until the species leave the work area on their own accord without harassment, consistent with the United States Environmental Protection Agency’s (USEPA) Endangered Species Act.”	The U.S. Fish and Wildlife Service administers the Endangered Species Act; this should be corrected in the text, please revise accordingly.
11	Section 2.5.3, page 22: “... the [Thin Cover] Pilot Study area was inspected every	The Pilot Study monitoring evaluated fiddler crab and burrow abundance. The proposed

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	6 months for a period of 24 months to monitor short-term impacts to marsh vegetation and marsh recovery process (vegetative and macroinvertebrate)."	long-term monitoring studies will evaluate infauna. Please explain why the macroinvertebrate monitoring changed. Also, please include fiddler crab and burrow abundance monitoring during long-term monitoring if planned.
12	Section 3.2.1, page 24: "During construction, the dredge prisms will serve as the basis for determining whether dredging has achieved the required elevations (in accordance with specified dredging tolerance requirements) by comparing postconstruction bathymetric survey data to the target dredge prism, as described in Section 10.1.1."	Chemistry samples should also be collected during dredging to confirm whether predicted SWACs or CULs were achieved.
13	Section 3.4, page 30: "Within Purvis Creek, to minimize the time between dredging and backfilling and efficiently make use of barge-mounted equipment, backfilling will occur as soon as dredging has been verified as complete within the Dredge Management Units (DMUs) located in Purvis Creek."	The criteria used to verify dredging is complete are based only on meeting the target dredge cut (Appendix G, Figure G-2). Criteria should also be based on comparison to chemical-specific CULs and predicted SWACs.
14	Section 4.2, page 35: "At the Scow Loading/Offloading Area, free liquids will be pumped out of the transport scows ..."	Please state here that the free liquids will be collected and processed through the water treatment system (WTS), as described in paragraph 3, page 36.
15	Section 5.2, page 38: "The selected material [for backfill] provides a coarser fraction of particles than existing high fines content material within the channels, this material will still provide suitable habitat but will limit the potential for high turbidity concerns from placement and reduce potential for loss of material out of the system due to erosion ... edges. Because the marsh is characterized as net depositional (as described in Section 2.3), it is expected that the surface sediments will naturally return to higher fines content material over time."	The Long-Term Monitoring Plan (LTMP) does not include any evaluation of the channel sediment/plant/benthic communities. Please add collection of sediment samples from the channels to the LTMP, with the performance standard being an increase in fines content. Existing pre-remedial samples should have adequate grain size information for comparison.
16	Section 5.3, page 40: "The decontamination standard for the dredge bucket, or other	As per Appendix B, all deconned equipment must be wipe tested:

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	<p>equipment that will remain on site and be dedicated to future potential project use and may be used for other operations (such as backfilling or capping), is pressure washing to remove all visible sediment on the surface of the equipment. ... If this initial testing verifies that decontamination procedures are effective, future wipe testing may be suspended and subsequent decontamination will be confirmed by visual inspection.”</p>	<p>“All earth-moving equipment, dredging and process equipment, pipelines, storage tanks, and miscellaneous equipment demobilized from the Site for the remainder of the Work requires decontamination. Equipment transitioning from dredging work to backfilling or thin layer cover (TLC) work, must also be decontaminated. The Contractor must perform wipe sampling and submit a written certification for each piece of equipment that wipe sampling has been conducted and has been cleared for transition to clean material handling or demobilization.”</p> <p>Wipe samples should be collected to confirm adequate decontamination of equipment.</p>
17	<p>Section 5.5, page 41: “Based on previous experience, though backfill operations will generate visible turbidity in the creek systems, they are generally less of an environmental concern since it is expected to be primarily clean sediment generated turbidity. A monitoring program will be implemented to provide a mechanism for assessing water-quality impacts during backfilling.”</p>	<p>The monitoring program described in Section 9 only includes monitoring of turbidity levels. If the turbidity action levels (Section 9.3) are exceeded, water samples should be collected to confirm the assumption that it is clean sediment-generated turbidity.</p>
18	<p>Section 6.3, page 44: “Results from the Thin Cover Pilot Study have shown that marsh grasses will reestablish effectively in either a 6-inch minimum or 9-inch minimum thin cover layer, although the 6-inch portions of the Pilot Study area have generally recovered more quickly.”</p>	<p>Please state that the target thickness for the TLC placement will be 6 inches.</p>
19	<p>Section 7.2.1, page 49: “During the Thin Cover Pilot Study, the marsh located underneath the temporary access roads was compressed by approximately 6 to 8 inches. Planting of smooth cordgrass at the location of the former temporary access road did not reliably recolonize these areas in a reasonable timeframe. Therefore, temporary access roads located outside the thin cover area will have imported topsoil placed to restore the temporary access roadways to their pre-</p>	<p>Please provide additional details for this section, including source of topsoil and plants, methods for planting, and analytical evaluation of topsoil before placement. Although the impacted area is not known until after remediation, the number of sample plots per area that will be required to evaluate restoration success can be defined now.</p>

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	<p>construction elevation and provide unconsolidated substrate for plant establishment. The imported topsoil will then be planted with smooth cordgrass to repopulate these areas (estimated to be around 7.5 acres total)."</p>	
20	<p>Section 8.1.2, page 52: "The contractor will provide a water treatment system (WTS) that handles free water separated from dredged sediments and construction waters. ... Water pumped into the WTS will be run through filters to remove suspended solids before and after treatment in the granular activated carbon (GAC) filter. ... Effluents from the WTS will be pumped westward to a designated temporary WTS discharge location, which is an existing swale with a dissipation mat system."</p>	<p>Please state that samples will be collected from the WTS to confirm that discharge requirements are met; how often confirmation samples will be collected; and the analyses that will be conducted.</p>
21	<p>Section 8.1.3: "Backfill will be placed at a thickness of 6 inches as post-dredge residual cover to be installed as shown on the Engineering Drawings (Appendix A)."</p>	<p>Section 5, page 38 states, "Following dredging to remove sediments (as described in Section 4) and verification of dredging (as described in Section 10), post-dredge backfill will be placed in two, 6-inch lifts to achieve a 12-inch layer in the dredged areas."</p> <p>Please be consistent when discussing backfill placement and thickness.</p>
22	<p>Section 9.3, page 58: "the water quality monitoring program includes monitoring for turbidity in Purvis Creek during dredging or backfilling. Specific turbidity monitoring locations will be dependent on where dredging or backfilling is occurring in Purvis Creek, LCP Ditch, Eastern Creek, or Domain 3 Creek. Turbidity monitoring will be performed using three automated turbidity monitoring buoys collecting data at regular intervals, such as every 15 minutes. ... The Advisory Level for the monitoring buoys data will be 50 nephelometric turbidity units ("NTU") above background, where background is defined as the lowest of the three monitoring buoy measurements. ... The action level for the</p>	<p>Turbidity is the only parameter that will be evaluated to assess water quality during remedial activities. If the turbidity action levels are exceeded, water samples should be collected to confirm the assumption that it is clean sediment generated turbidity.</p>

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	monitoring buoy data will be 100 NTU above background ...”	
23	Section 13, page 64: “Additionally, vegetation monitoring will be conducted in any areas that were disturbed during remedy implementation according to the same procedures as the thin layer cover vegetation monitoring.”	Please specify the number of sample plots/area to be evaluated in areas impacted by thin-layer placement activities and temporary access roads. Also identify target species and acceptance criteria.
24	Section 13, page 64: “The purpose of benthic community assessment is to document the reestablishment and composition of the benthic community within the thin layer cover area as part of determining whether the performance standards are being achieved. Benthic community samples will be collected at five locations within the thin layer cover areas to measure benthic invertebrate abundance and diversity.”	Because the stated objective is to document the re-establishment of the benthic community, please identify the metrics that the benthic samples will be compared with (pre-remedial samples, reference area samples?).
25	Section 13, page 65: “Water quality monitoring will be conducted to measure contaminant concentrations in surface water over time to assess whether concentrations are meeting or trending toward State of Georgia water quality criteria. Surface water samples will be collected at six locations within Purvis Creek, LCP Ditch, and Eastern Creek and one reference location in Troup Creek. The surface water samples will be submitted for total mercury, PCBs, and lead on a filtered and unfiltered basis and total suspended solids. Surface water sampling will be conducted in the fall during two tidal events: one at approximately ebb tide conditions and one during flood tide conditions.”	Please clarify the number and locations of proposed surface water samples; will six samples be collected from each creek or will a total of six samples be collected? Will samples be collected every fall for five years, or only one time?
26	Section 13, page 65: “For consideration of risk to wildlife and finfish, mummichog and fiddler crabs will be monitored. Seven fiddler crab and seven mummichog sampling locations will be included in the monitoring program. Sampling locations will focus on areas where remedial activities will occur (either dredge and backfill	Please add lipid analysis to the whole body mummichog samples.

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	<p>or thin layer cover areas). Locations include some that were sampled historically and others added to the remediation areas. Three composite samples will be collected at each sampling location for a total of 21 samples per species. Tissue samples will be analyzed for mercury, Aroclor 1268, and lipids (finfish only).”</p>	

Table 2. ERT comments on the Long-Term Monitoring Plan for the LCP Chemicals Site, Appendix I of the 95% Remedial Design Basis of Design Report

#	Section, page number, text	ERT Comment
1	Section 1.5.3, page 6, “Target tissue concentrations were not developed for protection of wildlife and finfish because their diets include multiple prey species. Monitoring data collected as part of this Long-Term Monitoring Plan (LTMP) will measure changes in contaminant concentration in prey tissue over time compared to baseline data from the same locations and thereby assess progress toward achieving Remedial Action Objective (RAOs) for protection of wildlife and finfish (i.e., RAOs 2 and 5, respectively).”	Please state the metric that will be used to determine if/when progress toward meeting RAO 2 is achieved. Should tissue concentrations be declining each time they are measured, or by a certain total amount, or be compared to a particular benchmark?
2	Table 3, benthos	For benthos, please provide additional detail. Samples will be collected at 5 locations in the thin layer cover area. Will these be sediment cores to evaluate benthic infauna? Fiddler crab number and number of burrow surveys (described in Appendix F, Pilot Study Monitoring Report) were conducted to evaluate the macroinvertebrate community during the Thin Layer Cover (TLC) Pilot Study. Will any evaluation of fiddler crabs be included in the monitoring? Will reference area or pre-remedial samples be collected for comparison? Will this be 5 sample locations for all of the area in yellow on Figure 7-1 of the Remedial Design Plan? How will sample locations be selected? Sample locations should be as similar as possible in terms of particle size, detrital and organic carbon content, habitat, elevation, and tidal position within the system. Co-located samples should be collected for chemistry at the benthic sampling locations.
3	Table 3, benthos and vegetation	Due to their sessile nature, plant and benthos samples should be collected at the same location every sampling event. Please state this in the text.
4	Table 3, surface water monitoring	Please state whether a total of 6 samples will be collected, or will 6 samples be collected from

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		each creek/ditch? Samples should also be collected from Domain 3 Creek.
5	Figure 4	Figure 4 indicates a total of 6 surface water samples. A sample should also be collected from Domain 3 Creek. An additional surface water sample in Purvis Creek south of the confluence with the LCP Creek Ditch is also recommended.
6	Table 3, fish and shellfish monitoring	<p>Please state that fillets will be analyzed for the human health fish samples, and whole-body fish will be collected for ecological receptor evaluation. Total number of samples for fiddler crab should be 21.</p> <p>Add lipids and percent (%) moisture to the ecological tissue analyte list.</p>
7	Section 2.1, page 9: Thin Layer Cover Monitoring	Please add an additional objective, "Evaluation of the stability/loss of the thin cap material," and identify performance standards for this objective.
8	Section 2.1, page 9: Thin Layer Cover	Please identify monitoring components that may need to be evaluated outside of the schedule defined in Table 3, e.g., in the event of severe storm events that may impact the marsh.
9	Section 2.1, page 9: "Confirm recovery and stability of marsh plants (minimum of 80 percent [%] coverage) ... Confirm marsh plant species remain consistent with restoration targets."	The restoration target plant species should be defined here.
10	Section 2.3.2, page 10: "A benthic community assessment will be performed on cover/ sediment samples collected at five locations in the thin layer cover area. The assessment will be conducted 1 year after remedial action has been completed and again at 5 years following remedial action, which will allow time for recolonization of benthic organisms. The numerical abundance and diversity of the benthic invertebrate community in Year 5 will be compared to the results from the Year 1 benthic community assessment to demonstrate	Sediment samples collected for benthic community assessment should also be evaluated for contaminant concentrations. Please add analysis of mercury, Aroclor 1268, lead and polycyclic aromatic hydrocarbons (PAHs) to the list of analyses on Table 3.

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	the recovery of the diversity and structure of the benthic community. Although considered, comparison to reference locations poses considerable challenges.”	
11	Section 2.3.2, page 10: The purpose of benthic community assessment is to document the reestablishment and composition of the benthic community within the thin layer cover area ...”	<p>Because the stated objective is to “document the reestablishment and composition of the benthic community,” pre-remedial samples should be collected to document the existing benthic community.</p> <p>Define the performance standards for numeric abundance and diversity that will indicate that RAO 4 has been met.</p>
12	Section 2.3.2, page 10: “Numerical abundance and diversity (achieved by count and taxonomic identification of benthic invertebrates) will permit calculation of Index of Biological Integrity metrics. The multiple factors that impact benthic communities will also be documented to assist in data interpretation.”	Define the “multiple factors that impact benthic communities” that will be documented here. These are stated in Section 2.3.2.2 (particle size, detrital and organic carbon content, habitat, elevation, and tidal position within the system).
13	2.3.2, page 11: “Changes in species type or abundance over time will be tracked and compared to the performance standards.”	Define the performance standards.
14	Section 4.2, page 14, Performance Standards Table: Concentrations meeting or trending toward target tissue concentrations for human health (0.099 and 0.11 milligrams per kilogram [mg/kg] for mercury and Aroclor 1286, respectively) and the national recommended and state criterion for human health (0.3 mg/kg for mercury)	<p>1) Please specify whether the cited fish tissue concentrations are on a dry or wet weight basis.</p> <p>2) The national criterion is for methylmercury in tissue (EPA, 2001); specify analysis for methylmercury.</p> <p>3) Editorial: it is Aroclor 1268.</p>
15	Section 4.3.1, page 16, “For both the spotted seatrout and southern kingfish, only the filet will be submitted for chemical analysis. The fish will be scaled, leaving the skin on, and then fileted. The filet will include the belly flap; however, the rib cage will be removed (GADNR 2020b).”	Is this preparation method (skin-on fillets with belly flap) consistent with how both recreational users and “high quantity fish consumers” prepare and consume fish? Please document. If there is a subsistence fishery, it is likely that other parts of the fish are consumed as well. Analysis of both fillets and carcass portions should be considered if appropriate.

#	Section, page number, text	ERT Comment
16	Section 4.3.3, page 16: “Mummichog and fiddler crab samples will be collected before remediation and in Years 3 and 5 following remedy completion. Sampling will not occur in Year 1 because, while immediate reductions in mercury and Aroclor 1268 concentrations in sediment in remedial areas are anticipated, the response in fish and shellfish tissue may take several years.”	Mummichog and fiddler crab tissue samples should also be collected in Year 1. If there is a spike in tissue concentrations after remediation (Year 1), having that data may help interpret Year 3 data if tissue samples are higher than or similar to the concentrations before remediation data.
17	Section 4.3.2, page 16:	State that composite samples will be whole body fish.
18	Section 4.3.2, page 15: “The number of fish and crab per composite, the range of lengths, and total weight per composite will be specified in the Field Sampling Plan (FSP).” Section 4.3.4, page 16: “Analytical and quality assurance/quality control (QA/QC) procedures will be presented in the Quality Assurance Project Plan (QAPP).”	EPA needs to review the QAPP and FSP before sampling is conducted.
19	Figure 6	Please describe how the mummichog and fiddler crab sampling locations were selected? Based on comparison with Figures 2-1a to e and 2-2a to e of the Remedial Design Report, many of the locations are where existing mercury and Aroclor 1268 concentrations are below the benthic community CULs.
20	Section 4.3.2, page 15: “A minimum of five individuals will be included in each composite sample, however more than five individuals may be required to meet minimum tissue requirements for sample analysis.”	Tissue mass requirements needed for mercury, Aroclor 1268 and lipid analysis should be determined by consultation with the analytical laboratory. The average weight of fiddler crabs and mummichogs should be available from the Remedial Investigation (RI) studies. The number of individuals per composite should be estimated based on those parameters.
21	Section 5, page 18: States, “If other elements of the remedy attain their respective clean up levels (CULs) and standards but (for example) tissue concentrations do not, or if downward trends in tissue concentrations of mercury and	Please complete the “then ...” part of this sentence.

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	Aroclor 1268 are delayed longer than anticipated.”	
22	Section 5, page 18, “Mummichog and fiddler crab tissue data will be compared to historical data to assess contaminant concentrations over time. Restoration of the benthic community diversity and structure in areas of remedial action will be documented. If results indicate that the RAOs have been met, then the monitoring program will be discontinued.”	Given that mummichog and crab, and the benthic community, do not have specific target concentrations or community indices that must be met, it is unclear at what point the monitoring program would be considered “complete” for these 2 endpoints. More clarity is needed on what constitutes “success” for these endpoints.

EPA, 2001. *Water Quality Criterion for the Protection of Human Health: Methylmercury*. EPA-823-R-01-001. January 2001. Office of Science and Technology, Office of Water.

EPA Region 4. 2015. Record of Decision. Summary of Remedial Alternatives Selection. LCP Chemicals Site. Operable Unit 1 - Marsh. Glynn County, Georgia.